

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PRICE ELASTICITIES AND INTERNET DIVERSION

Docket No. RM2014-5

MOTION FOR LEAVE TO FILE
(May 19, 2014)

The National Postal Policy Council (“NPPC”), the Association for Mail Electronic Enhancement (“AMEE”), the Association of Marketing Service Providers (AMSP), GrayHair Software, Inc. (GrayHair), the Greeting Card Association (“GCA”), the International Digital Enterprise Alliance, Inc. (“IDEAlliance”), the Major Mailers Association (“MMA”), and the National Association of Presort Mailers (“NAPM”) (collectively “Petitioners”) hereby respectfully move, pursuant to section 3001.21 of the rules of practice, for leave to file the “Reply In Support Of Petition” – filed concurrently herewith – to the “Answer of the United States Postal Service In Opposition To Petition To Initiate A Proceeding Regarding Postal Demand Analysis” filed on May 9.

Although a Reply to the answer to a petition for rulemaking is not contemplated by the rules of practice, Petitioners believe that certain aspects of the Postal Service’s Answer deserve to be addressed. Petitioners were unable to file their Reply before today due to the need to coordinate among the various parties to the petition. Petitioners respectfully submit that no party will be

prejudiced by acceptance of the Reply, nor should granting of leave to file the Reply result in undue delay in this proceeding.

Respectfully submitted,

Lawrence G. Buc
SLS Consulting, Inc.
1920 N Street, N.W.
Washington, D.C. 20036
(202) 349-7321

Arthur B. Sackler
Executive Director
NATIONAL POSTAL POLICY COUNCIL
1101 17th Street, N.W.
Suite 1220
Washington, D.C. 20036
(202) 955-0097

Ken Garner
President and CEO
Association of Marketing Service Providers
1800 Diagonal Road, Suite 320
Alexandria, VA 22314-2806
(703) 836.9200 x201
www.AMSP.org

Cameron Bellamy
President and CEO
GrayHair Software, Inc.
124 Gaither Drive, Suite 160
Mount Laurel, NJ 08054
(856) 727-9372

By: /s/ William B. Baker
William B. Baker
WILEY REIN LLP
1776 K Street, N.W.
Washington, D.C. 20006-2304
(202) 719-7255
Counsel for NATIONAL POSTAL
POLICY COUNCIL

Steven J. Krejciak
President
ASSOCIATION FOR MAIL
ELECTRONIC ENHANCEMENT
(AMEE)
3605 Forest Avenue
Brookfield, IL 60513-1603
(708) 485-4764

David J. Steinhardt
President and CEO
IDEAlliance
1600 Duke Street, Suite 420
Alexandria, VA 22314
(703) 837-1066

David F. Stover
Counsel
Greeting Card Association
2970 South Columbus Street
1B
Arlington, VA 22206-1450
(703) 998-2568
postamp@crosslink.net

MAJOR MAILERS ASSOCIATION
Mury Salls
DST Mailing Services
3531 Kilpatrick Lane
Snellville, GA 30039
MLSalls@dstmailingservices.com

Robert Galaher
Executive Director and CEO
NATIONAL ASSOCIATION OF
PRESORT MAILERS
P.O. Box 3552
Annapolis, MD 21403-3552